

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN NEROWSKI,

Plaintiff,

v

ESSENDANT CO.,

Defendant.

Case No. 1:20-cv-00589

Hon. Hala Y. Jarbou

Defendant's Proposed Voir Dire

Defendant Essendant Co. requests that the following questions be asked of the jury panel in this case:

1. What is your current address?
2. How long have you lived at that address?
3. Where else have you lived in the past ten years?
4. Please state the last grade in school that you completed.
5. What is your current occupation?
6. Who is your employer?
7. What duties do you perform in your present job?
8. If you are not employed, what is your present means of livelihood?
(For example: spouse's income, pension, social security retirement, etc.)
9. State what other occupations you have been employed in during the past ten years and what other duties you have performed.
10. Is your spouse/partner employed? If yes, what is the name of the employer?

11. Have you or your spouse/partner ever owned a business? If so, what is the nature of the business and how many persons are employed in the business?
12. Do you have any close friends or relatives who have any training or employment in the legal field?
13. Do you have any training or employment in the medical field?
14. Do you have any close friends or relatives who have any training or employment in the medical field?
15. Do you have children living at home? If yes, what are their ages?
16. Do you have any defects in your hearing?
17. Do you have any defects in your vision?
18. Have you ever had any foot or ankle problems? If so,
 - a. Do you know what caused your problems?
 - b. What treatment did you have?
 - c. Have you ever had foot or ankle surgery?
 - d. If so, do you consider the surgery a success?
19. Have you ever known of someone who had ankle surgery who had not been involved in an accident?
20. Have you ever been examined by Dr. Paul Drouillard? If yes, please explain.
21. Have you ever been examined by Dr. Mark Sawka? If yes, please explain.
22. Have you ever treated been examined by Dr. Gerald Shiener? If yes, please explain.
23. Have you ever been examined by Dr. Robin Hanks? If yes, please explain.
24. Have you ever been examined by Dr. William Cardasis? If yes, please explain.
25. Have you ever slipped and fallen on ice? If so, please explain the circumstances of your fall, including whether you were injured.

26. Have you or a member of your immediate family or close friend ever made a claim for personal injury?
27. Have you ever been to Essendant's distribution center on Northridge Drive in Grand Rapids?
 - a. If yes, please explain your experience and impressions of your visit.
 - b. Was there anything unpleasant about your experiences? If so, please explain.
28. If you find that the Plaintiff's conduct was the sole cause of his injury, would you have any hesitation to return a verdict for the Defendant?
29. If you find that the evidence shows that the Defendant was not at fault for Plaintiff's injuries, would you hesitate to find in favor of the Defendant?
30. Will you allow any natural human sympathy that you may feel for the Plaintiff and his injury to interfere with your returning a just verdict based upon the evidence?
31. If you were either the plaintiff or the defendant in this lawsuit, would you object to a person with your background and frame of mind (whatever it might be) from sitting as a juror?
32. Do you have any preconceived notions about the parties, the lawyers or the witnesses?

Defendant respectfully requests the right to supplement these Voir Dire questions at the time of jury selection.

Dated: December 6, 2021

PLUNKETT COONEY

/s/ Sandra J. Densham

Sandra J. Densham (P69397)

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